



LITE DEPALMA
GREENBERG, LLC

Newark • Chicago • Philadelphia

TWO GATEWAY CENTER, SUITE 1201
NEWARK, NJ 07102

TEL: 973.623.3000

FAX: 973.623.0858

www.litedepalma.com

August 30, 2013

ELECTRONICALLY FILED

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street, Room 7W
Trenton, NJ 08608

Re: ***In re New Jersey Tax Sales Certificates Antitrust Litig.***
Master Docket No.: 3:12-CV-01893-MAS-TJB

Dear Judge Shipp:

Enclosed for Your Honor is the settlement agreement entered into on August 14, 2013 between plaintiff class representatives and the defendants Royal Bancshares of Pennsylvania, Inc., Royal Bank America, Inc., Crusader Servicing Corporation, and Royal Tax Lien Services, LLC (collectively "Crusader Defendants"). The parties will file for preliminary approval of this settlement at a later date.

Pursuant to paragraph 28 of the settlement agreement with the Crusader Defendants, the plaintiffs and Crusader Defendants jointly request that the Court hold in abeyance the Crusader Servicing Corporation's Joinder to Defendants' Joint Motion to Dismiss [Dkt. No. 187], the Motion to Dismiss of Royal Bancshares of Pennsylvania, Inc., Royal Bank America, and Royal Tax Lien Services [Dkt. No. 185], and the Defendants' Joint Motion to Dismiss as it relates to the Crusader Defendants [Dkt. No. 174] (the "Motions"). Pursuant to the same paragraph of the settlement agreement, within 7 days following the entry of an order preliminarily approving this Settlement Agreement, the Crusader Defendants shall formally withdraw the Motions (or, in the case of the Defendants' Joint Motion to Dismiss, shall withdraw their participation in that motion), without prejudice to renewing the Motions in the event Final Approval of the Settlement is denied or the Agreement is rescinded.

Thank you very much for your consideration.

Respectfully,

/s/ Bruce D. Greenberg
Bruce D. Greenberg

BDG:al
Enclosure